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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF JOINT SUBMISSION
RE: SEALING PORTIONS OF THE
APRIL 29, 2021 HEARING TRANSCRIPT**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the parties’
7 Joint Submission re: Sealing Portions of the April 29, 2021 Hearing Transcript (“Transcript”). In
8 making this request, Google has carefully considered the relevant legal standard and policy
9 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief
10 that the information sought to be sealed consists of Google’s confidential and proprietary information
11 and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Transcript,
13 attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential technical
15 information regarding the various types of Google’s internal identifiers/cookies and their proprietary
16 functions, and the various types of data logs maintained by Google, that Google maintains as
17 confidential in the ordinary course of its business and is not generally known to the public or Google’s
18 competitors.

19 5. Such confidential information reveals Google’s internal strategy, system design, and
20 system capacity regarding various important products, and falls within the protected scope of the
21 Protective Order entered in this action. *See* Dkt. 61 at 2.

22 6. Public disclosure of such confidential information could affect Google’s competitive
23 standing as competitors may alter their log data and/or identifier system designs and practices relating
24 to competing products. It may also place Google at an increased risk of cyber security threats, as third
25 parties may seek to use the information to compromise Google’s log data and/or identifier systems.

26 7. For these reasons, Google respectfully requests that the Court order the identified
27 portions of the Transcript to be sealed.
28

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
2 correct. Executed in Los Angeles, California on May 19, 2021.

3
4 DATED: May 19, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

5
6
7 By 

Viola Trebicka

Attorney for Defendant